

Exhibit D

Case No. 1:13-cv-03495-CCB
Hon. Catherine C. Blake

4. Based on my experience with Allied Interstate, I have developed personal knowledge of the facts associated with the processes by which and equipment through which Allied Interstate

initiated telephone calls to the telephone number ending with -2049 that is at issue in this litigation between the dates of July 5, 2013 and November 19, 2013.

5. Telephone numbers dialed by Allied Interstate in its calling operations are not generated by a computer system, but rather are listed in the underlying client file.

6. The dialing equipment that Allied Interstate uses in its calling operations does not have the capacity to store or produce telephone numbers to be called using a random number generator.

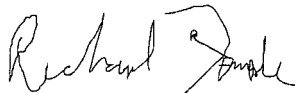
7. The dialing equipment that Allied Interstate uses in its calling operations does not have the capacity to store or produce telephone numbers to be called using a sequential number generator.

8. At no time between July 5, 2013 and November 19, 2013 did Defendant use dialing equipment that has the capacity to store or produce telephone numbers to be called using a random or sequential number generator to call the telephone number ending with -2049 that is at issue in this litigation.

9. I make this affidavit of my own personal knowledge and could, if called as a witness, testify competently to each fact set forth herein.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed at Parsippany, New Jersey on May 12, 2014.

A handwritten signature in black ink, appearing to read "Richard Temple", written over a horizontal line.

Richard Temple